

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA	I	Case No. 17-CR-419 (KMK)
	I	
V.	I	
	I	
LEIBYS MERCEDES,	I	
	I	
Defendant	I	

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**DEFENDANT'S MOTION IN LIMINE TO PRECLUDE THE  
GOVERNMENTS EXHIBITS**

September 28, 2018

Respectfully submitted,

/s/ Chukwuemeka Nwokoro  
Chukwuemeka Nwokoro  
Nwokoro & Scola, Esquires  
For Defendant Leibys Mercedes  
30 Broad Street, Suite 1424  
New York, NY 10004  
Tel: 212-785-1060  
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**DEFENDANT’S MOTION IN LIMINE TO PRECLUDE THE  
GOVERNMENT’S EXHIBITS**

The defendant, LEIBYS MERCEDES, through counsel, Chukwuemeka Nwokoro, hereby moves the Court to preclude the following proposed government Exhibits on the following grounds:

**Proposed Government Exhibit**

**Ground For Preclusion**

Exhibits 1 to 7	Relevance (F.R.E 401 and 403)
Exhibits 28 to 32	Relevance (F.R.E. 401 and 403)
Exhibit 34	Relevance (FRE 401 and 403)
Exhibits 100 to 105	Relevance/Authentication (F.R.E. 401, 403 and 901)
Exhibit 200	Authentication (F.R.E. 901)
Exhibits 201 through 215F	Relevance/Authentication (F.R.E. 401, 403 and 901)

Exhibits 400 through 424	Relevance/Authentication (FRE 401, 403 and 901)
Exhibits 500 through 598	Relevance/Authentication (FRE 401, 403 and 901)
Exhibits 596 to 599	Relevance/Authentication (FRE 401, 403 and 901)
Exhibits 600 through 612	Relevance/Authentication (FRE 401, 403 and 901)
Exhibits 700 through 711	Relevance/Authentication (FRE 401, 403 and 901)
Exhibits 800 through 815	Relevance/Authentication Prejudice (FRE 401, 403, 404, and 901)
Exhibits 816 and 817	Relevance (FRE 401 and 403)

Defendant respectfully states that his objections to the government's exhibits includes the above listed objections but does not exclude objections which are not listed above, and defendant Mercedes expressly reserves the right to object at trial to other Proposed Government Exhibits not listed above that were not properly or effectively disclosed and for which defendant did not have a reasonable opportunity to object prior to being offered in evidence at trial.

Respectfully submitted,

/s/ Chukwuemeka Nwokoro  
Chukwuemeka Nwokoro  
Nwokoro & Scola, Esquires  
For Defendant Leibys Mercedes  
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New York, NY 10004  
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**CERTIFICATION**

THIS IS TO CERTIFY that on September 28, 2018, a copy of the foregoing was filed electronically (and served by mail on anyone unable to accept service by electronic filing). Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Chukwuemeka Nwokoro  
Chukwuemeka